

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Industrial Print Technologies LLC,	§	
	§	
<i>Plaintiff and Counterclaim-</i>	§	
<i>Defendant,</i>	§	
	§	
v.	§	
	§	
O’Neil Data Systems, Inc., et al.,	§	Civil Action No. 2:14-cv-48 (JRG)
<hr/>	§	<hr/>
O’Neil Data Systems, Inc., et al.	§	Civil Action No. 2:14-cv-892 (JRG)
	§	
<i>Defendants and Counterclaim-</i>	§	
<i>Plaintiffs.</i>		

**DEFENDANTS O’NEIL DATA SYSTEMS, INC. AND HEWLETT-PACKARD
COMPANY’S MOTION FOR LEAVE TO FILE THEIR MOTION TO COMPEL AND
SUPPORTING DOCUMENTS UNDER SEAL**

Pursuant to Local Rule CV-5(a)(7), Defendants and Counterclaim-Plaintiffs O’Neil Data Systems, Inc. and Hewlett-Packard Company (“Defendants”) file this Motion for Leave to File their Motion to Compel and Supporting Documents Under Seal, and would show the Court as follows:

1. Defendants file their Motion to Compel concurrently with this Motion to Seal.
2. Defendants hereby move to seal their Motion.
3. Portions of the Motion and supporting documents are designated by IPT as “Confidential” or “Restricted — Attorneys’ Eyes Only” pursuant to the Protective Order (Dkt. 64 in Case No. 14-cv-19).
4. Counsel for Defendants has conferred with counsel for IPT regarding this Motion for Leave to Seal. Counsel for IPT refused to take a position as to whether it opposes this Motion for Leave to Seal.

Defendants therefore respectfully request that the Court grant them leave to file their

Motion under seal.

Dated: January 16, 2015

WEIL, GOTSHAL & MANGES LLP

/s/ Evan N. Budaj

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Systems, Inc.*

CERTIFICATE OF CONFERENCE

Pursuant to the Federal Rules of Civil Procedure and Local Rules CV-7(h) and CV-7(i), I certify that the requirements of CV-7(h) have been met and that Plaintiff Industrial Print Technologies LLC refused to take a position as to whether it opposes the Motion for Leave to Seal, as described in the Declaration of Evan N. Budaj in support of this Motion for Leave.

/s/ Evan N. Budaj

Evan N. Budaj

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via email on the 16th day of January, 2015.

/s/ Evan N. Budaj

Evan N. Budaj